



Samuel J. Bazian  
Direct Dial: 646.887.0314  
sbazian@steinadlerlaw.com

May 3, 2021

**VIA ECF**

Hon. Sanket J. Bulsara  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom 324N  
Brooklyn, New York 11201

Re: *Durand, et al., v. Excelsior Care Group LLC d/b/a Cold Spring Hills Center for Nursing and Rehabilitation and Emanuel*, Docket No. 1:19-cv-02810-KAM-SJB

Dear Judge Bulsara:

This firm represents Defendant Excelsior Care Group LLC d/b/a Cold Spring Hills Center for Nursing and Rehabilitation (“CSH”) in the above-referenced action. In accordance with Your Honor’s Status Report Order dated March 19, 2021, we write jointly with Plaintiffs’ counsel to provide an update on the progress of settlement discussions.

The parties have just recently reached an agreement in principle to resolve all of Plaintiffs’ wage and hour and related claims, and are now in the process of finalizing their agreement. To provide sufficient time for the parties to do so, the parties respectfully request that the Court set a control date of May 21, 2021 for the parties to provide a status report to the Court concerning the disposition of Plaintiffs’ wage and hour claims, and to propose an updated briefing schedule as to any dispositive motions for the remaining discrimination-related claims.

Thank you for your time and attention to this matter.

Respectfully Submitted,

/s/ Samuel J. Bazian  
Samuel J. Bazian

cc: All Counsel of Record (via ECF)